COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Boston Edison Company		D.T.E. 01-108
boston Edison Company)	D.1.E. 01-100

JOINT MOTION TO EXTEND THE SUSPENSION PERIOD FOR THE PROPOSED RATE WR, M.D.T.E. NO. 974

Now comes the Massachusetts Water Resources Authority ("MWRA"), Boston Edison Company ("Edison"), and the Office of the Attorney General (Attorney General")(collectively "the Moving Parties"), to move that the Department of Telecommunications and Energy ("Department") extend by an additional one month (from May 1, 2002 until June 1, 2002), the suspension period in the above captioned proceeding. The Moving Parties have reached a tentative agreement on an comprehensive program for a Rate WR transition cost charge that would result in a consensual resolution of the issues pending in this proceeding. In light of the comprehensive nature of the program the Moving Parties continue to require additional time to reduce that program to writing. The Moving Parties request an additional extension of the suspension period in order to finalize an agreement on exact terms for the program and to reduce that agreement to detailed written terms. The terms of this agreement would resolve the issues pending in this proceeding (as well as other matters relating to the provision of electric service to the MWRA's Deer Island wastewater treatment facility) on a basis that is consistent with the

Department's past decisions concerning Rate WR, the requirements of the relevant provisions of Chapter 164 of the General Laws, and the public interest. Pending the final resolution of this matter, the Standstill Agreement between MWRA and Edison would continue to apply to the same extent as during the initial suspension period.

In support of their motion, the Moving Parties submit the following as good cause for an additional extension of the suspension period:

- ?? The program for a Rate WR Transition Cost Charge extends beyond the upcoming year and the resulting necessity to ensure that the agreed upon language will produce the intended results under various scenarios has required an extensive review by the parties of proposed language;
- ?? An additional one month extension of the suspension period will result in a five month suspension of the proposed changes to Rate WR, which remains within the maximum suspension period set forth in G.L. c. 164, § 94.
- ?? The terms of the Standstill Agreement between MWRA and Edison preclude any party or the public interest from being harmed or benefited as a result of an additional delay in the effectiveness of any change in Rate WR.

The Moving Parties expect that a final written agreement will be submitted to the Department for its approval no later than the close of business on Thursday, April 30. In these circumstances, the Moving Parties submit that the public interest would be served by a limited extension of the suspension period in this proceeding.

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Respectfully submitted,

Massachusetts Water Resources Authority

Boston Edison Company

Office of the Attorney

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By its attorneys,

By its attorney,

By its attorney,

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